



**U.S. Department of Justice**

Criminal Division

***United States Attorney  
Central District of California***

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February 1, 2011

Via Email

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Re: United States v. Enrique Faustino Aguilar Noriega, et al.  
CR 10-1031 (A)-AHM

Dear Counsel:

Pursuant to your request for discovery and the Court's order, enclosed is a supplemental discovery production. Please find attached:

1. One CD, labeled "DOJ Production 2-01-2011," containing copies of the following documents, some of which have been previously produced on February 1, 2011, via email:
  - A. Various FBI 302 reports, with personal information and FBI numbers redacted, subject to the Court's February 1, 2011 protective order, Bates stamped Lindsey\_DOJ\_024015 to Lindsey\_DOJ\_024051;
  - B. Angela Aguilar's Visa application, Bates stamped Lindsey\_MISC\_023506 to Lindsey\_MISC\_023509;
  - C. Documents containing border crossing data for Enrique Aguilar, Angela Aguilar, and Nestor Moreno, received from the U.S. Department of Homeland Security and Bates stamped Lindsey\_MISC\_023510 to Lindsey\_MISC\_023536;
  - D. Jean-Guy Lamarche's passport, with personal information redacted, subject to the Court's February 1, 2011 protective order, Bates stamped Lindsey\_MISC\_023537; and

- E. Enrique Aguilar's alien registration file, received from the Department of Homeland Security, and Bates stamped Lindsey\_MISC\_023538 to Lindsey\_MISC\_023565.

The enclosed materials and any future discovery provided to you, which may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute or relevant case law, is provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

With this letter the government renews requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure.

Very truly yours,

ANDRÉ BIROTTE JR.  
United States Attorney

/s/ Jeffrey A. Goldberg  
DOUGLAS M. MILLER  
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Enclosure